



ENVIRONMENTAL SERVICES DEPARTMENT

AIR QUALITY DIVISION

1001 N. Central Avenue
Phoenix, Arizona 85004

Technical Guidance #TG99-003

Rule: 345, Section 301 & 303

Date: June 16, 1999

Subject: Coating limits for uncoated surfaces
and replacement parts used in
refinishing light-duty vehicles

Issue: Does Table 1 in Section 301, or Table 3 in Section 303 apply to the coating of previously uncoated body surfaces and replacement parts, including doors and quarter panels of a light-duty vehicle undergoing refinishing?

Discussion: The content of both Section 301 and the scope of Table 1's applicability shows neutrality regarding whether a part of a previously finished vehicle slated for refinishing has (or has not) been previously coated. Firstly, subsection 301.1 states: "No person shall....apply coating on a previously finished automobile/light-duty vehicle....unless the coating's VOC content complies with the applicable limits in Table 1." As can be seen from this, no distinction is made as to whether any particular part of a "previously finished" vehicle has previously been coated.

Secondly, subsection 301.3 makes it clear that Table 1 limits apply to the coating of "appurtenances", "...even if the item has never been coated or used."

Table 3 applies to the following coating operations:

- Any coating of vehicles that are neither "light-duty vehicles" nor "heavy-duty trucks";
- Coating any component (of any vehicle) such as steering gear, suspension, drive train, etc., that is **not** part of the body/chassis; and
- Coating operations at an original equipment manufacturer that makes heavy-duty trucks. [See definition, Section 215.]

Conclusion: The coating of previously uncoated surfaces and replacement parts of a previously finished, light-duty vehicle body is regulated by Table 1. Table 1 applies to all light-duty vehicle-refinishing operations, except for parts that are not part of the body/chassis.

[Signed 8/10/99]

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